

Steven James Turberville  
(Name)

415 Straight Creek Rd.  
(Address)

New Tazewell TN 37825  
(City, State, Zip)

10069  
(CDCR / Booking / BOP No.)

FILED

2018 FEB 13 P 12:12

U.S. DISTRICT COURT  
EASTERN DIST. TENN.

DEPT. CLERK

United States District Court  
~~Southern District of California~~

Steven James Turberville,  
(Enter full name of plaintiff in this action.)

Plaintiff,

v.

Jeremy O. Myers,  
Tazewell Police Dept.,  
Marisa Anders,  
Claborne Progress News,  
(Enter full name of each defendant in this action.)

Defendant(s).

Civil Case No. 3:18-mc-9  
(To be supplied by Court Clerk)

Reeves/Guyton

Complaint under the  
Civil Rights Act  
42 U.S.C. § 1983

A. Jurisdiction

Jurisdiction is invoked pursuant to 28 U.S.C. § 1343(a)(3) and 42 U.S.C. § 1983. If you wish to assert jurisdiction under different or additional authority, list them below.

B. Parties

1. Plaintiff: This complaint alleges that the civil rights of Plaintiff, Steven James Turberville  
(print Plaintiff's name), who presently resides at 415 Straight Creek Rd.  
(mailing address or place of confinement) New Tazewell TN 37825, were violated by the actions of the below named individuals. The actions were directed against Plaintiff at Tazewell TN / Claborne Co Jail on (dates) 11/8/17, 11/8/17, and 11/8/17.  
(institution/place where violation occurred) (Count 1) (Count 2) (Count 3)

2. Defendants: (Attach same information on additional pages if you are naming more than 4 defendants.)

Defendant Jeremy D. Myers (name) resides in Claiborne County TN (County of residence),

and is employed as a Detective Lt. (defendant's position/title (if any)). This defendant is sued in

his/her ☒ individual ☐ official capacity. (Check one or both.) Explain how this defendant was acting under color of law: I was Arrested by Jeremy D. Myers

in Tazewell TN. When he made false statements to The Claiborne Progress that I was on the run from Homicide

Defendant Marisa Anders (name) resides in Claiborne County TN (County of residence),

and is employed as a Reporter (defendant's position/title (if any)). This defendant is sued in

his/her ☒ individual ☐ official capacity. (Check one or both.) Explain how this defendant was acting under color of law: Marisa Anders published a story in

the Claiborne Progress stating that I was a Homicide suspect on the run from GA which is false.

Defendant \_\_\_\_\_ (name) resides in \_\_\_\_\_ (County of residence),

and is employed as a \_\_\_\_\_ (defendant's position/title (if any)). This defendant is sued in

his/her ☐ individual ☐ official capacity. (Check one or both.) Explain how this defendant was acting under color of law: \_\_\_\_\_

Defendant \_\_\_\_\_ (name) resides in \_\_\_\_\_ (County of residence),

and is employed as a \_\_\_\_\_ (defendant's position/title (if any)). This defendant is sued in

his/her ☐ individual ☐ official capacity. (Check one or both.) Explain how this defendant was acting under color of law: \_\_\_\_\_

**C. Causes of Action** (You may attach additional pages alleging other causes of action and the facts supporting them if necessary.)

**Count 1:** The following civil right has been violated: Defamation of character

(E.g., right to medical care, access to courts,

Liable, The pursuit of happiness, Abuse of Authority, Public Slander  
due process, free speech, freedom of religion, freedom of association, freedom from cruel and unusual punishment, etc.)

**Supporting Facts:** [Include all facts you consider important to Count 1. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, *by name*, did to violate the right alleged in Count 1.]

On November 8 2017 I was arrested By Lt. Jeremy D. Myers. After I was Arrested and in Jail, Lt. Myers Reported to Marisa Anders at the Claiborne Progress that I was a "wanted Homicide Suspect" I have Never been charged with or wanted for Homicide.

Count 2: The following civil right has been violated:

Libel, Defamation of

(E.g., right to medical care, access to courts,

character, the pursuit of life and happiness, Slander, public Slander  
due process, free speech, freedom of religion, freedom of association, freedom from cruel and unusual punishment, etc.)

**Supporting Facts:** [Include all facts you consider important to Count 2. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, *by name*, did to violate the right alleged in Count 2.]

On Wednesday November 8, 2017 at 8:50 PM  
Marisa Anders of the Claiborne Progress, printed  
a story stating that I was a "homicide suspect  
from GA" and I was a "Homicide suspect with  
an extensive criminal history" I have never been  
and am not a Homicide suspect. Nobody at the  
newspaper thought to see if the statement by  
Jeremy D. Myers was true and correct.

Count 3: The following civil right has been violated: liable, Defamation of Character  
(E.g., right to medical care, access to courts,  
life and the pursuit of happiness, public Slander, Abuse of Authority  
due process, free speech, freedom of religion, freedom of association, freedom from cruel and unusual punishment, etc.)

**Supporting Facts:** [Include all facts you consider important to Count 3. State what happened clearly and in your own words. You need not cite legal authority or argument. Be certain to describe exactly what each defendant, *by name*, did to violate the right alleged in Count 3.]

On Nov 8 2017, The Tazewell police dept.  
put a post on facebook claiming that I was  
a murder suspect on the run from GA,  
which is completely false. I have never  
been a murder suspect nor was I on the  
run from GA as a wanted murderer

**D. Previous Lawsuits and Administrative Relief**

1. Have you filed other lawsuits in state or federal courts dealing with the same or similar facts involved in this case? ☐ Yes ☒ No.

If your answer is "Yes", describe each suit in the space below. [If more than one, attach additional pages providing the same information as below.]

(a) Parties to the previous lawsuit:

Plaintiffs: \_\_\_\_\_

Defendants: \_\_\_\_\_

(b) Name of the court and docket number: \_\_\_\_\_

(c) Disposition: [ For example, was the case dismissed, appealed, or still pending?] \_\_\_\_\_

(d) Issues raised: \_\_\_\_\_

(e) Approximate date case was filed: \_\_\_\_\_

(f) Approximate date of disposition: \_\_\_\_\_

2. Have you previously sought and exhausted all forms of available relief from the proper administrative officials regarding the acts alleged in Part C above? [E.g., CDCR Inmate/Parolee Appeal Form 602, etc.] ? ☐ Yes ☒ No.

If your answer is "Yes", briefly describe how relief was sought and the results. If your answer is "No", briefly explain why administrative relief was not exhausted.

*There is no other relief that I am aware of for this situation.*

### E. Request for Relief

Plaintiff requests that this Court grant the following relief:

1. An injunction preventing defendant(s):

maliciously prosecuting me  
or printing any more stories that are false  
about me in any social media or other publications

2. Damages in the sum of \$ 100,000.00.

3. Punitive damages in the sum of \$ 1,000,000.00.

4. Other: \_\_\_\_\_

### F. Demand for Jury Trial

Plaintiff demands a trial by ☒ Jury ☐ Court. (Choose one.)

### G. Consent to Magistrate Judge Jurisdiction

In order to insure the just, speedy and inexpensive determination of Section 1983 Prisoner cases filed in this district, the Court has adopted a case assignment involving direct assignment of these cases to magistrate judges to conduct all proceedings including jury or bench trial and the entry of final judgment on consent of all the parties under 28 U.S.C. § 636(c), thus waiving the right to proceed before a district judge. The parties are free to withhold consent without adverse substantive consequences.

The Court encourages parties to utilize this efficient and expeditious program for case resolution due to the trial judge quality of the magistrate judges and to maximize access to the court system in a district where the criminal case loads severely limits the availability of the district judges for trial of civil cases. Consent to a magistrate judge will likely result in an earlier trial date. If you request that a district judge be designated to decide dispositive motions and try your case, a magistrate judge will nevertheless hear and decide all non-dispositive motions and will hear and issue a recommendation to the district judge as to all dispositive motions.

You may consent to have a magistrate judge conduct any and all further proceedings in this case, including trial, and the entry of final judgment by indicating your consent below.

Choose only one of the following:

☐ Plaintiff consents to magistrate judge jurisdiction as set forth above.

OR

☒ Plaintiff requests that a district judge be designated to decide dispositive matters and trial in this case.

1/31/2018  
Date

[Signature]  
Signature of Plaintiff

Steve Turberville 10000  
415 Straight creek rd  
New Tazewell TN. 37825

RECEIVED

FEB 13 2018

Clerk, U. S. District Court  
Eastern District of Tennessee

At Knoxville

Clerk of U.S. district court  
800 Market Street, Suite 130

~~800 Market Street, Suite 130~~  
Knoxville TN 37902



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